REMARKS

In response to the above-identified Office Action, Applicants amend the Application and seek re-consideration in view of the following remarks. In this Response, Applicants amend claims 1-18 and 21-22. Applicants do not cancel or add any claims. Accordingly, claims 1-18 and 21-22 remain pending in the Application.

I.   **Claims Rejected Under 35 U.S.C. §103**

Claims 1-18 and 21-22 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 6,983,446 issued to Charisius et al. ("*Charisius*") in view of the ordinary skill in the art ("*OSA*"). Applicants respectfully traverse the rejection, at least in view of the amendments to claims 1-18 and 21-22.

To render a claim obvious, the cited reference must teach or suggest each and every element of the rejected claim (*see* MPEP § 2143). Among other elements, claim 1 defines:

> A method for verifying generated computer code having a plurality of lines generated by a code generating module from a model file of a system including a plurality of functions generated by a model module, the method comprising:
>
> generating a parsed computer code for the model file based on the determined values, inputs, outputs, function type, and syntax for the model file; [and]
>
> comparing each line of the generated computer code and the parsed computer code to determine if the generated computer code includes correct values, correct inputs, correct outputs, correct functions, and correct syntax. (Emphasis added).

Applicants submit that the combination of *Charisius* and the *OSA* fails to teach or suggest at least these elements of amended claim 1.

Charisius discloses a software development tool that provides:

> simultaneous round-trip engineering, i.e., the graphical representation 204 is synchronized with the textual representation 206. Thus, if a change is made to the source code 202 via the graphical

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> representation 204, the textual representation 206 is updated
> automatically. Similarly, if a change is made to the source code 202
> via the textual representation 206, the graphical representation 204 is
> updated as the model is changed and the model is updated as the
> source code is changed.

Thus, Applicants submit that a "parsed computer code" is not being generated in *Charisius'* system and method as recited in claim 1. Specifically, *Charisius* does not disclose two codes being generated from the same model file, and certainly does not disclose a parsed computer code generated by a verification module and used to verify the correctness (e.g., values, inputs, outputs, function type, and syntax) of the generated computer code generated by a code generating module because *Charisius* is concerned with modifying the model file and the source code simultaneously so that they are consistent with one another. That is, parsed computer code is not being used in *Charisius* to check the correctness of the model file in *Charisius'* system and method. Therefore, *Charisius* fails to teach or suggest each and every element of amended claim 1. The Patent Office relies on the *OSA* to cure the defects of *Charisius*; however, Applicants submit that the *OSA* fails to cure such defects.

In making the rejection, the Patent Office does not rely on the *OSA* as teaching or suggesting the elements of "generating a parsed computer code for the first generated computer code based on the determined values, inputs, outputs, function type, and syntax for the model file" and "comparing each line of the generated computer code and the parsed computer code to determine if the generated computer code includes correct values, correct inputs, correct outputs, correct functions, and correct syntax," as recited in amended claim 1. Furthermore, Applicants submit that it is not within the skill set of the skilled artisan in this art to know such elements. Therefore, the *OSA* fails to cure the defects of *Charisius*.

The failure of the combination of *Charisius* and the *OSA* to teach or suggest each and every element of claim 1 is fatal to the obviousness rejection. Therefore, claim 1 is not obvious over *Charisius* in view of the *OSA*. Accordingly, Applicants respectfully request withdrawal of the rejection of independent claim 1.

Claims 2-6 and 21 depend from claim 1 and include all of the elements thereof. Therefore, Applicants submit that claims 2-6 and 21 are not obvious over *Charisius* in view of the *OSA* at least for the same reasons as claim 1, in addition to their own respective features. Accordingly, Applicants respectfully request withdrawal of the rejection of claims 2-6 and 21.

Regarding the rejection of claims 7-11 and 22, claims 7-11 and 22 each recite the elements of "code that generates a parsed computer code based on the determined values, inputs, outputs, function type, and syntax" (emphasis added) and "code that compares each line in the generated computer code and the parsed computer code to determine if the generated computer code includes the determined values, inputs, outputs, function type, and syntax in the parsed computer code" similar to the elements of "generating a parsed computer code for the generated computer code based on the determined values, inputs, outputs, function type, and syntax for the model file" and "comparing each line of the generated computer code and the parsed computer code to determine if the generated computer code includes correct values, correct inputs, correct outputs, correct functions, and correct syntax," as recited in claim 1. As such, Applicants submit that the discussion above regarding the combination of *Charisius* and the *OSA* failing to teach or suggest each and every element of claim 1 is equally applicable to similar elements recited in claims 7-11 and 22. Therefore, Applicants submit that claims 7-11 and 22 are not obvious over *Charisius* in view of the *OSA* at least for the same reasons as claim 1, in addition to their own respective features. Accordingly, Applicants respectfully request withdrawal of the rejection of claims 7-11 and 22.

Regarding the rejection of claims 12-18, claims 12-18 each recite the elements of "generate a parsed computer code for the model file based on the determined values, inputs, outputs, functions type, and syntax for the model file" (emphasis added) and "compare each line in the generated computer code with the parsed computer code to determine if the generated computer code includes correct values, correct inputs, correct outputs, correct functions, and correct syntax" similar to the elements of "generating a parsed computer code for the model file based on the determined values, inputs, outputs, function type, and syntax for the model file" and "comparing each line of the generated computer code and the parsed computer code to determine if the generated computer code includes correct values, correct inputs, correct outputs, correct functions, and correct syntax," as

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recited in claim 1. As such, Applicants submit that the discussion above regarding the combination of *Charisius* and the *OSA* failing to teach or suggest each and every element of claim 1 is equally applicable to similar elements recited in claims 12-18. Therefore, Applicants submit that claims 12-18 are not obvious over *Charisius* in view of the *OSA* at least for the same reasons as claim 1, in addition to their own respective features. Accordingly, Applicants respectfully request withdrawal of the rejection of claims 12-18.

II.   Interview Summary

Applicants conducted an interview with the Examiner on September 15, 2009. During the interview, the Examiner indicated that he felt that Applicants' disclosure did not discuss a second source code being generated and compared against a first source code, but rather that Applicants' disclosure discussed that a "metadata" or other similar type of computer code was generated and compared with the generated source code.

CONCLUSION

In view of the foregoing, it is believed that all claims now pending are in condition for allowance. A Notice of Allowance is earnestly solicited at the earliest possible date. If the Examiner believes that a telephone conference would be useful in moving the application forward to allowance, the Examiner is encouraged to contact the undersigned at (480) 385-5060 or jgraff@ifllaw.com.

If necessary, the Commissioner is hereby authorized to charge payment or credit any overpayment to Deposit Account No. 50-2091 for any fees required under 37 C.F.R. §§ 1.16 or 1.17, particularly extension of time fees.

Respectfully submitted,

INGRASSIA, FISHER & LORENZ

Date: September 30, 2009   By: /JASON R. GRAFF, REG. NO. 54,134/
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